

73371

29547

Date: 6/11/99 8:01 PM
 Sender: "S Manning" <Snigals@tesco.net>
 To: 9-NPRM-CMTS
 cc: Eric Van Opstal
 Priority: Normal
 Subject: 207-Mins ETOPS RESPONSE

OFFICE OF THE
 CHIEF COUNSEL
 RULES DOCKET
 1999 JUN 17 A 10:23

22

-----= NextPart_001_0053_01BEB445.334733C0
 Content-Type: text/plain;
 charset="iso-8859-1"
 Content-Transfer-Encoding: quoted-printable

FAA-99-6717-26

Sir, please find herewith attached British Airline Pilots Association =
 response to Docket No. 29547 proposal for 207-Minute Extended Range =
 Operations WithTwo-EngineAircraft (ETOPS) Operational Approval Criteria. =

-----= NextPart_001_0053_01BEB445.334733C0
 Content-Type: text/html;
 charset="iso-8859-1"
 Content-Transfer-Encoding: quoted-printable

<!DOCTYPE HTML PUBLIC "-//W3C//DTD W3 HTML//EN">
 <HTML>
 <HEAD>

<META content=3Dtext/html; charset=3Diso-8859-1 =
 http-equiv=3DContent-Type>
 <META content=3D"MSHTML 4.72.3110.7" name=3DGENERATOR>
 </HEAD>

<BODY bgColor=3D#ffffff>
 <DIV>Sir, please find herewith attached =
 British=20
 Airline Pilots Association response to Docket No. 29547 proposal for =
 207-Minute=20
 Extended Range Operations WithTwo-EngineAircraft (ETOPS) Operational =
 Approval=20
 Criteria. </DIV></BODY></HTML>

-----= NextPart_001_0053_01BEB445.334733C0--


 FAA207 BALPA
 Final.doc


 RFC822.TXT


 FAA 207
 Response.doc

BALPA

COMMENTS FROM BRITISH AIRLINE PILOTS ASSOCIATION

TO

FAA, WASHINGTON DC 20591

RE. 207 - MINUTES ETOPS APPROVAL CRITERIA

DOCKET NO. 29547

BALPA thanks FAA for making available the opportunity to comment on the proposal of **ATA** and **ALPA** to extend diversion time.

BALPA accepts and supports the need for establishing the safe extension of diversion time for suitably equipped and operated two-engined jet transport aircraft.

BALPA acknowledges and applauds the improvements that manufacturers have made to their products in response to the challenge of the **ETOPS** environment.

ooOOOooo

Any proposal by the FAA for increasing diversion time should meet the following principles:

- Harmony with **JAA**
- Meets accepted Safety Criteria
- Complies with Rules

FAA/JAA Harmony

As yet although the FAA accept **harmonisation** to be an objective, if this proposal goes forward it will be a move away from such harmony. The **JAA** have been developing the regulatory material for increasing diversion time beyond **180-minutes** and seek participation with FAA in that process. If adopted, this unilateral proposal would not be in accord with the stated objective of the FAA to **harmonise** with the **JAA**.

Meeting Safety Criteria

Hitherto the safe growth and development of **ETOPS** has been achieved in a progressive way by associating increasing diversion time with aircraft type design and operator capability. This proposal is not in accord with such safely demonstrated methods.

In support of extending diversion time by **15%** the proposal cites the historical **15%** extension of diversion time of **120-minutes** to **138-minutes** as a precedent. Like is not being compared with like. **138-minutes** diversion time was granted to aircraft with **180-minutes** Type Design Approval and was thus within their capability. **207** -minutes is however beyond the Type Design Approval capability of current **two**-engined aircraft. The additional **18** minutes of diversion time calculated in still air can become **21** minutes in a typical headwind whereas an additional **27** minutes can become **32** minutes in the same headwind.

In recent years engine design and reliability have improved to exceed the required standards of **180-minutes** diversion times. This proposal, however, sets a figure for **IFSD** which at **.019** is not adequate to safely meet the proposed extended diversion time. Besides, current engines are demonstrating **IFSD** rates which show that suitable safe failure rates are achievable for further extensions of diversion time. Such appropriate low rates should therefore be mandated by regulation for any increase in diversion time.

The extremes of a cold operating environment which exist on routes which the proposal would allow make pneumatic system reliability a requirement for safe flight. A reliable third source of bleed air will be required. The proposal does not address the **APU** start reliability or continuous running requirements necessary to achieve the required safe environment within the aircraft.

Rule Compliance

It would appear that this proposal is commercially driven, as it seems to be a response to the wants of some operators of specific aircraft types on specific routes. There already exist suitable aircraft types for operation on such routes without the need for making further exceptions to the Rules.

The trend for two-engined aircraft to be used on world-wide routes encompassing all extremes of operating environments in all areas demands adequate Rule making. This progression of **ETOPS** to be a fully mature part of the aviation industry requires a commensurate maturing of the Rules. Any creation of further exceptions inhibits the maturing of the Rules.

Whilst this proposal seeks use of **207-minutes** diversion time “on an exception basis” it provides no means for the adequate monitoring nor objective grant of approval for each flight so **despatched**. The **207-minutes** operation could become the norm with inadequate control.

Conclusion

BALPA finds the **ATA /ALPA** proposal inadequate and unsuitable for the safe and orderly extension of diversion times for two-engined aircraft on long range world wide routes.

This proposal will inhibit the proper development of **harmonised** rule-making for future long range operations.

Acceptance of this proposal and implementation by the FAA would fail to ensure the maintenance of the present level of safety currently achieved in **ETOPS**.

BALPA calls for the FAA to resist requests for commercially driven exceptions to present requirements and urges the FAA to join with other Regulatory Authorities in developing comprehensive Rules for the safe regulation of all long range operations.

British Airline Pilots Association

81 New Road Harlington, Hayes Middx. UB3 5BG

11th June 1999

Federal Aviation Administration
Office of the Chief Counsel
Rules Docket Office, [29547]
800 Independence Avenue, SW
Room 915-G
Washington, DC 20591

Dear Sir,

Re. Docket No. 29547 ----- 207 -Minute Extended Range ETOPS Approval Criteria

We write in response to the call for public comment following the Air Transport Association request for the FAA to issue a Policy Letter permitting an extension of maximum diversion time up to **207** minutes on some flights.

We attach herewith our comments and request that any further queries that you may have be directed to Carolyn Evans, Technical Secretary, **BALPA**, (Tel: **44 1293 449100**, Fax: **44 1293 449129** E-mail: **carolynevans@balpa.org.uk**)

Yours faithfully,

Captains Alan Ward and Chris Manning.